

George Haines, Esq.
Nevada Bar No. 9411
Gerardo Avalos, Esq.
Nevada Bar No. 15171
FREEDOM LAW FIRM, LLC
8985 South Eastern Ave., Suite 350
Las Vegas, NV 89123
Phone: (702) 880-5554
FAX: (702) 385-5518
Email: info@freedomlegalteam.com
Attorneys for Plaintiff Derek Myers

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Derek Myers,

Plaintiff,

v.

Trans Union, LLC; Equifax
Information Services, LLC; Experian
Information Solutions, Inc.; Wells
Fargo Bank, N.A.; First Service Credit
Union; Citibank, N.A. dba Citicards,
CBNA; and Silver State Schools Credit
Union,

Defendants.

Case No.: 2:22-cv-02026 -RFB-BNW

**Stipulation to extend deadline to file
the proposed discovery plan and
scheduling order**

(First request)

Derek Myers (“Plaintiff”); Wells Fargo Bank, N.A; Equifax Information Services, LLC; and First Service Credit Union (“Defendants”) (jointly as the “parties”), by and through their respective counsel, hereby stipulate to extend Local Rule 26-1’s deadlines for the parties to hold their initial Fed. R. Civ. P. 26(f) conference and to file their proposed discovery plan and scheduling order (the “Deadlines”).

1 Good cause exists to extend the Deadlines because of excusable neglect. Due
 2 to an internal calendaring error, plaintiff's counsel failed to reach out to defense
 3 counsel and arrange to hold the discovery conference prior to the deadline to file the
 4 proposed discovery plan and scheduling order, February 17, 2023. The Parties now
 5 need additional time for counsel to coordinate to set the discovery conference and
 6 review the proposed discovery plan and scheduling order prior to filing.
 7 Additionally, the Parties are engaged in active settlement discussions that may
 8 alleviate the need to submit a proposed discovery plan.

9 Therefore, it is appropriate to extend the deadlines for the Parties to file their
 10 proposed discovery plan and scheduling order to allow time for the Parties to meet
 11 and confer in compliance with Local Rule 26-1(b).

12 The parties hereby request to extend the Deadlines by 30 days, making the
 13 new deadline for the submission of a stipulated discovery plan and scheduling order
 14 on or before **March 19, 2023**. This is the first request for an extension of this
 15 deadline.

16 Dated: February 22, 2023.

17 **FREEDOM LAW FIRM**

18 /s/ Gerardo Avalos
 19 George Haines, Esq.
 20 Gerardo Avalos, Esq.
 21 8985 S. Eastern Ave., Suite 350
 22 Las Vegas, Nevada 89123
 23 *Counsel for Plaintiff Derek Myers*

24 **WRIGHT, FINLAY & ZAK, LLP**

25 /s/ Christina V. Miller
 26 Christina V. Miller, Esq.
 27 7785 W. Sahara Ave., Suite 200
 Las Vegas, Nevada 89117

HUGHES WATTERS & ASKANASE

/s/ Michael Weems
Michael Weems, Esq.
1201 Louisiana St. 28th Floor
Houston, Texas 77002
Counsel for First Service Credit Union

CLARK HILL PLLC

/s/ Gia N. Marina
Gia N. Marina, Esq.
3800 Howard Hughes Drive, Suite 500
Las Vegas, Nevada 89169
Counsel for Equifax Information Services LLC

SNELL & WILMER LLP

/s/ Tanya N. Lewis
Kelly H. Dove, Esq.
Tanya N. Lewis, Esq.
1980 Festival Plaza Drive, Suite 900
Las Vegas, Nevada 89135
Counsel for Wells Fargo Bank, N.A.

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: February 23, 2023